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NATIONAL RURAL TELECOM ASSOCIATION

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October 15, 1997

COPY

Chairman Reed E. Hundt
Federal Communications Commission
1919 M Street, N.W., Room 814
Washington, D.C. 20554

Re: CC Docket No. 96-45 — Rural Task Force

Dear Chairman Hundt:

In response to the Public Notice of September 17, 1997, the National Rural Telecom Association (NRTA) endorses Evelyn Jerden, who was nominated in a letter from Senator Pete Domenici of New Mexico, sent October 8, 1997. Ms. Jerden is the Director of Revenue Requirements for Western New Mexico Telephone Company, Silver City, New Mexico (Western). As the attached information sheet indicates, she is uniquely qualified to serve on the Rural Task Force.

Ms. Jerden is qualified as a Certified Public Account and has developed extensive subject matter expertise in accounting and jurisdictional separations for telephone companies. She has been active participant in local exchange carrier associations, including NRTA, as they have formulated positions on small company issues and for FCC and state proceedings to implement the Telecommunications Act of 1996. She has gained knowledge of the network design challenges facing rural providers in the course of her employment with Western. She also has experience in dealing with small and rural telephone company cost issues in the telecommunications group of a major national accounting firm and, in her current position, continues to deal with small company cost and high cost support issues, service to Native Americans and the special needs of extremely sparsely populated areas, like the New Mexico service area served by Western.

The Joint Board's notice clearly indicates that the task force membership will include a wide array of industry representatives. No doubt, the result will be a diversity of opinions. Indeed, rural representatives may be in the minority on the "Rural Task Force." Therefore, the Joint

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Board should make it clear that dissenting opinions can be expressed. Members must be allowed to prepare a minority view report when they cannot reach consensus and the minority views should be made a part of the final report and recommendation of the Rural Task Force.

NRTA commends the Joint Board for taking a separate look at universal service needs in rural telephone company areas and stands ready to assist in the process.

Sincerely,

A handwritten signature in black ink, reading "Margot Smiley Humphrey". The signature is written in a cursive, flowing style. The first name "Margot" is written with a large, prominent "M". The last name "Humphrey" is written with a large, prominent "H".

Margot Smiley Humphrey
Attorney for the National Rural
Telecom Association

Service List

The Honorable Julia Johnson, State Chair
Chairman
Florida Public Service Commission
2540 Shumard Oak Blvd.
Gerald Gunter Building
Tallahassee, FL 32399-0850

The Honorable Laska Schoenfelder
Commissioner
South Dakota Public Utilities Commission
State Capitol, 500 East Capitol Street
Pierre, SD 57501-5070

Charles Bolle
South Dakota Public Utilities Commission
State Capitol, 500 East Capitol Street
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Pennsylvania Office of Consumer Advocate
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Sheryl Todd
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Maryland Public Service Commission
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Baltimore, MD 21202-6806

The Honorable David Baker
Commissioner
Georgia Public Service Commission
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Atlanta, GA 30334-5701

The Honorable Martha S. Hogerty
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Texas Public Utility Commission
1701 North Congress Avenue
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Austin, TX 78701

**NATIONAL RURAL TELECOM ASSOCIATION
RURAL TASK FORCE NOMINEE PROFESSIONAL QUALIFICATIONS**

NOMINEE: Evelyn C. Jerden
Director - Revenue Requirements

NOMINEE COMPANY: Western New Mexico Telephone Company, Inc.
314 West Yankee Street, Silver City, NM 88062
505-388-2546; 505-388-2540 FAX

NOMINEE ADDRESS: 4070 N. Circulo Manzanillo, Tucson, AZ 85750
520-577-9864; 520-577-9849 FAX; EJERDEN@worldnet.att.net

NOMINEE CATEGORY: Incumbent Local Exchange Carrier (ILEC) with less than \$40 Million Annual Operating Revenues.

EMPLOYMENT HISTORY: 1979 - 1992 Ernst & Young Telecommunications Consulting Group.
1992 - Current Western New Mexico Telephone Company, Inc.

PROFESSIONAL QUALIFICATIONS: Certified Public Accountant (CPA), Washington State since 1979. Bachelor of Business Administration, Pacific Lutheran University, Tacoma, Washington, May 1979. Subject Matter Expert in FCC Part 32, Uniform System of Accounts, Part 36, Jurisdictional Separations and Part 69, Access Charges.

RELATED INDUSTRY PARTICIPATION: Evelyn is an active member of the National Rural Telecom Association's Legislative Committee. She is also active in the New Mexico Exchange Carrier Group (NMECG). She co-chairs the NMECG USF Committee and is a member of the NMECG small company committee. Evelyn participates in the New Mexico Universal Service Fund (NMUSF) Task Force and is also a member of the United States Telephone Association's (USTA) Universal Service Work Group.

KNOWLEDGE OF POLICY ISSUES: As a member of the NMUSF Task Force, Evelyn is currently working on many of the relevant policy issues impacting rural companies. The NMUSF Task Force is comprised of ILECs, IXCs, CLECs, wireless, consumer advocates, commission staff and other representatives which will be very similar to the composition of the federal Rural Task Force. Evelyn's experience with the NMUSF Task Force should assist her in understanding the issues and complexities of each issue.

KNOWLEDGE OF RURAL ISSUES: As a consultant with Ernst & Young's Telecommunications Group for over 13 years, Evelyn worked on numerous projects for both large and small ILECs. She became knowledgeable about the different conditions under which small rural ILECs must operate versus large ILECs. Evelyn left E&Y in 1992 as a Senior Manager to become the Director of Revenue Requirements for Western New Mexico Telephone Company (Western). Since 1992, Evelyn has become even more intimately familiar with the operations of a small rural LEC, since Western serves approximately 6,100 access lines over 15,000 square miles with an average of approximately 1.5 access lines per route mile.

KNOWLEDGE OF ENGINEERING ISSUES: In the preparation of ILEC cost studies, Evelyn has had to become knowledgeable regarding the network. This includes understanding the various conditions which impact engineering, such as the length of the loop, or the cost break-even points between copper and fiber. She has also had experience with both large central office switches (e.g., Nortel DMS-100 with RSCs and RLCMs) and small switches (e.g., Nortel DMS-10).

KNOWLEDGE OF ECONOMICS: As a CPA, Evelyn has a technical financial background and understands several different costing methods including the importance of cost model input factors.

KNOWLEDGE OF SPECIAL CONCERNS: Evelyn understands some of the needs of special concern groups since Western provides service to Native Americans on the Alamo Navajo Indian Reservation.